

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

**NOTICE OF RECLAMATION DEMAND OF  
BROTHER INTERNATIONAL CORPORATION**

**PLEASE TAKE NOTICE** that by and through its undersigned counsel at McElroy, Deutsch, Mulvaney & Carpenter LLP and Becker LLC, Brother International Corporation (“**Brother**”) hereby files this notice of the delivery of written demand for reclamation of goods pursuant to 11 U.S.C. § 546(c), upon JOANN Inc, and its affiliated debtors (collectively, the “**Debtors**”) and Debtors’ counsel, to reclaim certain assets (the “**Goods**”) that are subject to reclamation. The Goods were manufactured and sold to JOANN Inc. in the ordinary course of Brother’s business and delivered to and received by the Debtors during the forty-five (45) day period prior to the filing of the above-captioned Chapter 11 cases while the Debtors were insolvent. Brother attaches as **EXHIBIT A** and incorporates herein by reference a copy of its formal reclamation demand dated January 31, 2025.

**PLEASE TAKE FURTHER NOTICE** that as part of its demand for reclamation, Brother is demanding that the Goods be segregated, identified, and not be commingled with any other goods.

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

**PLEASE TAKE NOTICE** that Brother reserves all of its rights and remedies under Title 11 of the United States Code (as amended, the “**Bankruptcy Code**”), the Uniform Commercial Code, and any other applicable law, including the right to amend and/or supplement this Notice and to maintain that Brother has title to the Goods. Nothing herein shall be deemed or constitute a waiver of, and Brother expressly reserves any and all rights, claims, remedies, interest, and defenses, whether at law or in equity, including but not limited to Brother’s right to an allowed administrative expense claim under section 503(b)(9) of the Bankruptcy Code or under any other applicable federal or state law.

Dated: February 4, 2025  
Wilmington, DE

/s/ Gary D.Bressler  
Gary D. Bressler (DE No. 5544)  
**McELROY, DEUTSCH, MULVANEY &  
CARPENTER LLP**  
300 Delaware Avenue, Suite 1014  
Wilmington, DE 19801  
Telephone: (302) 300-4508  
Facsimile: (302) 654-4031  
Email: gbressler@mdmc-law.com

*Counsel to Brother International Corporation*

-and-

Eric R. Perkins  
**BECKER LLC**  
354 Eisenhower Parkway, Suite 1500  
Livingston, NJ 07039  
Telephone: (973) 422-1100  
Facsimile: (973) 422-9122  
E-mail: eperkins@becker.legal

*Counsel to Brother International Corporation*